

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**THE NATIONAL FEDERATION  
OF THE BLIND OF VIRGINIA, *et al.*,**

**Plaintiffs,**

**Case No. 3:23-cv-127-HEH**

**v.**

**VIRGINIA DEPARTMENT OF  
CORRECTIONS, *et al.*,**

**Defendants.**

**PLAINTIFFS' MOTION *IN LIMINE* TO PERMIT  
THE INCARCERATED PLAINTIFFS AND WITNESSES TO WEAR CIVILIAN  
CLOTHES AT TRIAL**

Plaintiffs, by and through undersigned counsel, hereby move this Court to permit the incarcerated Plaintiffs and any incarcerated witnesses they call to appear before the jury in civilian clothes and without visible shackles to ensure their Due Process rights to a fair trial. The grounds for requesting this relief are set forth in the accompanying Memorandum.

Dated: May 6, 2024

Respectfully submitted,

/s/ Samantha Westrum

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**CERTIFICATE OF SERVICE**

I hereby certify that on this 6th day of May 2024, I filed the foregoing electronically with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing (“NEF”) to the following:

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*Counsel for Defendant Virginia Department of Corrections*

I hereby certify that I will mail the foregoing document by U.S. Mail and electronic mail to the following non-filing user:

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